

Message

From: Cyran, Carissa [Cyran.Carissa@epa.gov]
Sent: 8/25/2021 2:06:45 PM
To: Lowit, Anna [Lowit.Anna@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]
Subject: Re: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

Thank you! This is very helpful. I am going to send the suggested language, along with this information for background.

From: Lowit, Anna <Lowit.Anna@epa.gov>
Sent: Wednesday, August 25, 2021 9:41 AM
To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Subject: RE: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

It is accurate that the 2016 HHRA did not go to the SAP. However, unlike OPPT, we don't use FACA to review our risk assessments per se. We use the FIFRA SAP to review major issues and new methods. So, it is also accurate to say that none of the CPFOS HHRA's have to SAP but the major science and approaches have been reviewed by the SAP (multiple times for most aspects).

Anna

From: Cyran, Carissa <Cyran.Carissa@epa.gov>
Sent: Wednesday, August 25, 2021 9:38 AM
To: Lowit, Anna <Lowit.Anna@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Subject: Re: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

Thank you, Anna, I understand. Below is the response with the initial language Dana provided. Based on what Michal is asking, we need to add a sentence on how the proposed rule/revised risk assessment didn't go through the SAP. Is the highlighted text accurate?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: Lowit, Anna <Lowit.Anna@epa.gov>

Sent: Wednesday, August 25, 2021 9:16 AM

To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>

Subject: RE: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

Carissa

In the previous version of this response

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Anna

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Wednesday, August 25, 2021 8:59 AM

To: Lowit, Anna <Lowit.Anna@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>

Subject: Re: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

This is all I have from Michal - *I may be confusing the different SAPs, but believed that v* Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) *If that is accurate, perhaps add it to the paragraph below?*

I added some text (yellow highlighted text), based on what I found on our website, but wasn't quite sure what else to say.

From: Lowit, Anna <Lowit.Anna@epa.gov>

Sent: Wednesday, August 25, 2021 8:53 AM

To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>

Subject: RE: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

I don't understand what you're looking for.

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Wednesday, August 25, 2021 8:44 AM

To: Lowit, Anna <Lowit.Anna@epa.gov>

Subject: Re: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

Good morning, Anna,

I just wanted to check in on the 2016 SAP follow up from Michal. Is there anything further we can say? Thank you!

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Tuesday, August 24, 2021 2:40 PM

To: Lowit, Anna <Lowit.Anna@epa.gov>

Subject: Michal follow up on 2016 SAP: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

Hi Anna,

Michal has asked we add additional language regarding the 2016 FIFRA SAP and the revised assessment. Are you ok with the highlighted text? Thank you!

Michal comment - *I may be confusing the different SAPs, but believed*

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

If that is accurate, perhaps add it to the paragraph below?

RESPONSE:

Ex. 5 Deliberative Process (DP)

From: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Sent: Tuesday, August 24, 2021 2:04 PM

To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>

Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>

Subject: RE: OCSPP IO review: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

From Michal –

Ok – I may be confusing the different SAPs, but believed that

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

If that is accurate, perhaps add it to the paragraph below?

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Tuesday, August 24, 2021 12:44 PM

To: Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>

Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>

Subject: Re: OCSPP IO review: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

PRD and HED staff prefer the previous version as the revised text removes many of the key points that are needed to address the issue.

From: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Sent: Tuesday, August 24, 2021 12:15 PM

To: Ozmen, Shamus <Ozmen.Shamus@epa.gov>

Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>

Subject: RE: OCSPP IO review: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

I reorganized some and sent to Michal. See feedback from Michal. Does this work for OPP?

Response:

Ex. 5 Deliberative Process (DP)

From: Ozmen, Shamus <Ozmen.Shamus@epa.gov>

Sent: Tuesday, August 24, 2021 11:30 AM

To: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>

Subject: OCSPP IO review: press inquiry from The Intercept/Sharon Lerner - chlorpyrifos

Importance: High

Hi Cheryl,

Please find for your review the response to the inquiry from The Intercept regarding chlorpyrifos.

Incoming:

We are running a piece on chlorpyrifos and have the follow points for you to review. If you would like to comment on any of the following, please send me your comments by noon tomorrow.

Thank you,

Sharon

The agency's 2016 risk assessment recognized epidemiological studies that showed that the pesticide had lasting effects on children's brains, including those done by Virginia Rauh

Instead of relying on the work by Rauh and others looking directly at human effects, the latest decision on chlorpyrifos used a less sensitive endpoint - the depression of cholinesterase activity.

"EPA could have used the human evidence," said Tracey Woodruff, director of the Program on Reproductive Health and the Environment at the University of California, San Francisco. "But they actually walked back what they did in 2016."

"They are just creating barriers to using these studies," said Woodruff, who said she believed that industry capture within the pesticide program as the source of the problem.

Patti Goldman, an attorney for Earthjustice, told me that "You can bet the chemical companies are going to work on these models as fast as they can now," she said. "They'll try to get EPA to say, 'Oh, let's pinpoint the exposure that causes 10 percent cholinesterase inhibition,'" the cutoff now used. "And if that happens, children would be exposed to levels that damage their brains."

Goldman told me that she fears the reliance on the cholinesterase endpoint in the chlorpyrifos decision could be used in the upcoming assessments of the 15 other organophosphate pesticides now used on food to potentially allow them to stay in use.

Response:

Ex. 5 Deliberative Process (DP)

From: Daguiard, Robert <Daguiard.Robert@epa.gov>

Sent: Monday, August 23, 2021 6:09 PM

To: OPS CSID CB <OPS_CSID_CB@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Cc: Labbe, Ken <Labbe.Ken@epa.gov>

Subject: OPS: Sharon Lerner - chlorpyrifos

Good evening team.Sharon's latest.

Best as always, R.

=====

Hi Nick, Robert and the Press office-

We are running a piece on chlorpyrifos and have the follow points for you to review. If you would like to comment on any of the following, please send me your comments by noon tomorrow.

Thank you,
Sharon

The agency's 2016 risk assessment recognized epidemiological studies that showed that the pesticide had lasting effects on children's brains, including those done by Virginia Rauh

Instead of relying on the work by Rauh and others looking directly at human effects, the latest decision on chlorpyrifos used a less sensitive endpoint - the depression of cholinesterase activity.

"EPA could have used the human evidence," said Tracey Woodruff, director of the Program on Reproductive Health and the Environment at the University of California, San Francisco. "But they actually walked back what they did in 2016."

"They are just creating barriers to using these studies," said Woodruff, who said she believed that industry capture within the pesticide program as the source of the problem.

Patti Goldman, an attorney for Earthjustice, told me that "You can bet the chemical companies are going to work on these models as fast as they can now," she said. "They'll try to get EPA to say, 'Oh, let's pinpoint the exposure that causes 10 percent cholinesterase inhibition,' the cutoff now used. "And if that happens, children would be exposed to levels that damage their brains."

Goldman told me that she fears the reliance on the cholinesterase endpoint in the chlorpyrifos decision could be used in the upcoming assessments of the 15 other organophosphate pesticides now used on food to potentially allow them to stay in use.

Sharon Lerner
Investigative Reporter
The Intercept
mobile/signal Ex. 6 Personal Privacy (PP)
@fastlerner
<https://theintercept.com/staff/sharonlerner/>

PGP:
CB29 D9FF 9285 3205 087E 83A1 0C30 2F39 4F30 8BFE